Question 1: Is there demand to use the band for wireless cameras?.:

Nomad Digital has no information relating to the demand in this spectrum for wireless cameras.

Question 2: Is there demand for other uses of the band?:

The band has been available across Europe in one form or another for the past 10 years of so. In that time to our knowledge there has not been significant use of the band in terms of its original designation as a 3GPP TDD. A number of years ago we understood that a UK based company were developing broadband wireless equipment that could be used in the band but we are not aware of any significant deployments.

Lightly licensed or licence-exempt use of the band might be considered in connection with femto-cell deployments if some piece of paired spectrum could be found so that at least part of the 2010 to 2025MHz band could be used in the universally adopted 3GPP FDD mode.

Question 3: How might demand for the band change in the foreseeable future?.:

More recently we have observed that companies have successfully bid for this band in Norway and Germany. It is not clear what use these companies have in mind for the spectrum but it may be related for increasing backhaul capacity of 3G mobile networks.

In summary it appears that although there has not been any significant demand for the spectrum in the past some sort of demand may be developing in the medium term.

Question 4: Should any wireless-camera use of the band be licence-exempt?.:

Wireless-cameras are normally deployed within a commercial context, we do not believe therefore that their use in the band should be licence-exempt. In fact we believe that the current congestion of the 2.4GHz band with WiFi suggests that the use of wireless-cameras in this band should be phased out.

Question 5: Should any other use of the band be licence-exempt?.:

Only if low power devices such as Femto cells designed for home and office use are able to use the band.

Question 6a: If we allocate the band to PMSE, is there good reason not to set TLCs to allow all of 2010-2110 MHz to be treated as a single band?.:

If the band is allocated to PMSE we consider that setting the TLCs to allow 2010-2210 MHz to be treated as a single band would lead to the most efficient utilisation of the entire band.

Question 6b: If so, what TLCs should we set?.:

TLCs that are already specified for the 2025-2210 MHz band.

Question 7a: If we allocate the band to PMSE, is there good reason not to provide the same security of tenure as for other PMSE-allocated bands?.:

If demand for the band is starting to rise for mobile services as described in our response to question 3 then it would seem prudent to limit security of tenure in terms of PMSE use.

Question 7b: f so, what security of tenure should we provide?.:

A period of 5 years following completion of the Olympics seems appropriate given the development cycle for wireless equipment.

Question 8a: If we allocate the band to PMSE, is there good reason not to set fees for access on the same basis as most of the spectrum at 2-3 GHz used for wireless cameras?.:

Our view is that fees should be set on a commercial basis for the use of the PMSE bands.

Question 8b: If so, how should we set fees for access?.:

Using the same principles as Ofcom has already applied to other bands.

Question 9a: If we do not immediately decide to allocate the band to PMSE, is there good reason not to allow temporary use for wireless cameras in line with our approach to the 2290 MHz band?:

Please refer to question 7b for our response.

Question 9b: If so, what should we do until we make and implement our decision on the best way to release it?:

A further consultation in three years time to review demand for the band. If it is clear at this stage that demand is not increasing on a European and to a certain extent, worldwide basis, then proposals should be brought forward to allocate it permanently to PMSE.

Question 10: Do you agree we should make the 2010 MHz band available for the Olympics?.:

We agree that the band should be made available for use during the Olympics if as indicated in the consultation document there is significant PMSE demand for the band over the period of the Olympics.